

NOT SUBJECT TO PROTECTIVE ORDER



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SA/SDD/RMT  
F.# 2012R01574

271 Cadman Plaza East  
Brooklyn, New York 11201

May 1, 2013

**Via ECF**

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*for Mohamed Yusuf*

Re: United States v. Ahmed et al.  
Criminal Docket No. 12-661 (S-1)(SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides additional expert notice in the above-referenced matter. This disclosure supplements the government's prior disclosures of November 26, 2012, January 21, 2013 and two disclosures dated April 5, 2013.

The government hereby provides notice that it will introduce expert testimony regarding the methods and operations of al-Shabaab, including testimony indicating that that the October 2008 bombings in Boosaaso and Hargeisa were executed in

a manner consistent with al-Shabaab's known tactics and political ideologies.<sup>1</sup>

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By:                     /s/                      
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Enclosures

cc: Clerk of Court (SLT)

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<sup>1</sup> Additionally, the government clarifies its prior disclosure of April 5, 2013, regarding statements made by al-Shabaab in connection with the Boosasso and Hargeisa attacks. Specifically, the government hereby advises that initial reports released by the news media, specifically Al Jazeera, indicated that al-Shabaab had claimed responsibility for those attacks. Subsequently, al-Shabaab published a statement indicating they had not made such a statement. An English translation of the statement is forthcoming.